

From: [Allen, Bob \(PCS\)](#)
To: [Miller, Garyg](#)
Cc: [Owens, Rock \(CAO\)](#); [Palachek, Randy M](#)
Subject: RE: SJRWP Draft Feasibility Study-EPA question 12/11/13
Date: Wednesday, December 11, 2013 2:04:21 PM
Importance: High

Gary,

Randy Palachek with Parsons will be calling you this afternoon at 214 665 8318 to discuss comment number 9.

Thanks and let me know if you need anything else....Bob

From: Palachek, Randy M [mailto:Randy.M.Palachek@parsons.com]
Sent: Wednesday, December 11, 2013 11:44 AM
To: Allen, Bob (PCS)
Cc: Owens, Rock (CAO)
Subject: RE: SJRWP Draft Feasibility Study-EPA question 12/11/13

Bob,

I can call him. No problem. The 0.4 ng/kg is the current WQS listed in chapter 307. I can call you after lunch

From: Allen, Bob (PCS) [mailto:Bob.Allen@pcs.hctx.net]
Sent: Wednesday, December 11, 2013 11:16 AM
To: Palachek, Randy M
Cc: Owens, Rock (CAO)
Subject: SJRWP Draft Feasibility Study-EPA question 12/11/13

Randy,

Gary Miller left a voice mail message and would like to talk to about this comment, in particular the .4.

To keep this simple you could call Gary directly to discuss. Your thoughts before I get back to Gary??

Bob

9) Section 3.3, Applicable or Relevant and Appropriate Requirements ("ARARs").

TSWQS (30 TAC §307.1-10) are one of the ARARs listed in Section 3.3. To protect human health from dioxins in fish consumption, Texas has adopted a water quality criterion of 0.4 ng/kg of 2378-TCDD TEQ in fish tissue in waters of the state. Based on the average site-specific BSAF of 0.34 measured in the remedial investigation, catfish exposed to the site sediments at 220 ng/kg TEQ (~149 ng/kg 2378-TCDD based on site area weighted concentrations) are expected to result in catfish tissue concentrations of approximately 51 ng/kg 2378-TCDD, without even considering contributions to TEQ from other congeners. This predicted concentration is more than 100 times higher than surface water quality standards which must be met. While there is uncertainty in the measured BSAFs, even the lowest measured BSAFs predict substantial exceedance of water quality standards for fish tissue. We recommend that the proposed PCLs be revised to consider this water quality standard in the ARARs. Additional ARARs must also be considered, as noted in



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prior sections of this document.

See Attachment 3 for TCEQ TSWQS TEQ criteria.